



December 5, 2018

VIA CM/ECF & HAND DELIVERY

The Honorable Leonard P. Stark
U.S. District Court for the District of Delaware
844 North King Street, Room 6325, Unit 26
Wilmington, DE 19801-3555

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Re: ***Novartis Pharmaceuticals Corporation v. Accord Healthcare, Inc., et al.,***
C.A. No. 18-1043-LPS

Dear Chief Judge Stark:

McCarter & English, LLP
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Plaintiff Novartis Pharmaceuticals Corporation ("Novartis") and Defendants Hetero Labs Limited, Hetero Labs Limited Unit-V, Hetero USA Inc., Bionpharma Inc., and Princeton Pharmaceutical, Inc. (collectively "Defendants") write to request the scheduling of a discovery teleconference.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confers (by telephone) on October 15, 2018, and November 13, 2018:

BOSTON

HARTFORD

STAMFORD

NEW YORK

NEWARK

EAST BRUNSWICK

PHILADELPHIA

WILMINGTON

WASHINGTON, DC

- For Plaintiff: Paul Torchia from Gibson Dunn & Crutcher, LLP, Dan Silver from McCarter & English, LLP (October 15), and Benjamin Smyth from McCarter & English, LLP (November 13).
- For Defendants: Howard Suh from Holland & Knight LLP, and Kenneth Dorsney from Morris James LLP.

The issues requiring judicial attention are listed below:

- The sufficiency of Defendants' disclosures of ESI custodians and non-custodial data sources.
- Defendants' responses and objections to certain requests for production set forth in Novartis's First Set of Common Requests for the Production of Documents and Things to all Defendants.
- Defendants' responses and objections to certain interrogatories set forth in Novartis's First Set of Common Interrogatories to all Defendants.

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Respectfully Submitted,

/s/ Daniel M. Silver

Daniel M. Silver (#4758)

cc: Counsel of record (via electronic mail)